

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FLORA B. DAVILA

21 MC 102 (AKH)  
CASE NO. 07CV4463

Plaintiff

**NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT**

**ELECTRONICALLY FILED**

V.

1221 AVENUE HOLDINGS, LLC ET. AL.,

Defendants

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PLEASE TAKE NOTICE that Defendant, 59 MAIDEN LANE ASSOCIATES, LLC, (hereinafter 59 MAIDEN LANE) as and for its response to the allegations set forth in the Complaint by adoption or Check-Off Complaint related to the Master Complaint filed herein and applicable to the above captioned matter hereby adopts all of the responses and all of the affirmative defenses contained in the Answer to the Master Complaint dated, filed and served August 3, 2007, *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21MC 102 (AKH). The responses to all of the allegations in the Master Complaint are adopted herein and are applicable to the Check-Off Complaint served and filed herein. Defendant, 59 MAIDEN LANE, also adopts the responses contained in any Amended Answer filed and served herein.

PLEASE TAKE FURTHER NOTICE that Defendant, 59 MAIDEN LANE, reserves the right to serve and file an amended answer and specifically reserves the right to interpose a cross claim against any and all co-defendants.

PLEASE TAKE FURTHER NOTICE that Defendant, 59 MAIDEN LANE, also adopts all affirmative defenses and jury demand herein.

WHEREFORE, 59 MAIDEN LANE demands judgment dismissing the above-captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York  
October 9, 2007

  
\_\_\_\_\_  
Suzanne M. Halbardier Esq. (SMH-0310)  
BARRY McTIERNAN & MOORE  
Attorneys for Defendants  
59 MAIDEN LANE ASSOCIATES, LLC  
2 Rector Street 14<sup>th</sup> Floor  
New York, NY 10006  
(212) 313-3600

**Index No.: 07 CV 4463**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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FLORA B. DAVILA,

Plaintiff(s),

-against-

1221 AVENUE HOLDINGS, LLC, et al.,

Defendants.

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**NOTICE OF ADOPTION OF ANSWER TO MASTER COMPLAINT**

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PLEASE TAKE NOTICE

[ ]

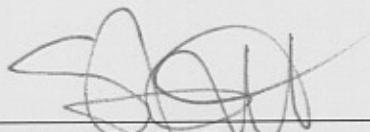
**notice of entry** that the within is a (certified) true copy of an entered in the office of the clerk of the within named Court on

[ ]

**notice of settlement** that a Proposed Order of which the within is a true copy will be presented for settlement before the Honorable \_\_\_\_\_ one of the judges of the within named Supreme Court, \_\_\_\_\_ County, \_\_\_\_\_, at 9:30 a.m. on the \_\_\_\_ day of \_\_\_\_\_.

Dated: New York, New York

October 9, 2007



Shawnette A. Fluitt, Esq.  
BARRY, MCTIERNAN & MOORE  
Attorneys for Defendants  
2 Rector Street - 14<sup>th</sup> Floor  
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File No.: ATR51958